

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

STUART PIVAR,

Plaintiff,

vs.

THE VAN GOGH MUSEUM,

Defendant

Civ A No. 1:21-cv-09362-LLS

**NOTICE OF MOTION TO DISMISS**

Please take notice that the defendant, the Van Gogh Museum Foundation, named in the complaint as the Van Gogh Museum, will and hereby does move, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order dismissing this action under the doctrine of *forum non conveniens* and, pursuant to Fed. R. Civ. P. 12(b)(2), for lack of personal jurisdiction. In support of this motion, the defendant submits the accompanying and concurrently filed memorandum of law, the Declaration of Marije Vellekoop, the Declaration of Cathalijne van der Plas, and the Declaration of Theodore J. Folkman.

Dated: December 21, 2021

Respectfully submitted,

*/s/ Theodore J. Folkman*

**FOLKMAN LLC**

Theodore J. Folkman (pro hac vice)  
53 State St., Suite 500  
Boston, MA 02109  
Tel. (617) 219-9664  
Fax (857) 336-0206  
[ted@folkman.law](mailto:ted@folkman.law)

**STONE LAW GROUP PLLC**

Ralph M. Stone (RS-4488)  
1700 Broadway, 41<sup>st</sup> Floor  
New York, NY 10019  
Tel. (212) 292-5690  
Fax (212) 292-5680

*Attorneys for the Defendant*

CERTIFICATE OF SERVICE

I certify that on December 21, 2021, I served the foregoing document by first-class mail, postage prepaid, on counsel of record for the plaintiff.

*/s/ Theodore J. Folkman*